



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101

July 13, 2007

Reply To  
Attn Of: ETPA-088

Ref: 05-049-MMS

John Goll, Regional Director  
Alaska OCS Region  
Minerals Management Service  
3801 Centerpoint Drive, Suite 500  
Anchorage, AK 99503-5823

Re: Final Environmental Impact Statement: Chukchi Sea Planning Area, Oil and Gas Lease Sale 193 and Seismic Surveying Activities in the Chukchi Sea

Dear Mr. Goll:

The U.S. Environmental Protection Agency (EPA) has reviewed the **Chukchi Sea Planning Area, Oil and Gas Lease Sale 193 and Seismic Surveying Activities in the Chukchi Sea** (CEQ No. 20070246) in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

In our letter dated December 27, 2006, we rated the Draft EIS, EC-2 (Environmental Concerns- Insufficient Information). EPA concerns were primarily based on data gaps and uncertainties in the alternatives analyses that were used to formulate the conclusions in the document; synchronization with other NEPA activities and associated environmental justice issues; lack of information on potential impacts to threatened, endangered, and proposed species; the level of cumulative impacts analysis; and oil spill probabilities and risks methodologies. We recommended that the most current information be incorporated into the final EIS to reduce data gaps and ensure consistency among the analyses of the various Mineral Management Service (MMS) projects currently underway, and that methodologies for the analysis on oil spill probability and risks be clarified.

We believe that the final EIS and the Response to Comments adequately addresses the majority of our concerns. MMS has clarified the oil spill probability and risk calculations that it conducted, as well as provided additional explanation of the approach used. MMS has also integrated the results of its Section 7 consultations with US Fish and Wildlife (USF&W) on threatened spectacled eiders into the final EIS, and continues to work with USF&W on the designation of critical habitat for the polar bear. EPA appreciates MMS's explanation regarding the approach taken to lessen the impacts of the various NEPA analyses on North Slope and Northwest Arctic communities, including the utilization of comments received for any project if pertinent to others, as well as the MMS's efforts to tier from other project documents. Therefore, EPA has no objection to the action as proposed.

In addition, we appreciate the willingness of MMS to address the issue of human health impacts, and what that analysis might entail. EPA has initiated dialog both internally and externally to determine the appropriate scope and content of health impact assessments, as well as what resources may be available to agencies undertaking this type of analysis. Our agency recognizes that there needs to be a causal linkage between the proposed project and the impact before health impact assessment (HIA) can be considered, and this determination will be made on a project specific basis.

EPA also realizes that potential impacts to human health from oil and gas development are a significant concern for North Slope residents, and that much effort has already been put forth by various entities, including the North Slope Borough, Alaska Inter-Tribal Council, and the Bureau of Land Management (BLM), to begin to identify this concern. We are also aware of the need for additional work to identify and clarify the role of HIA in the context of NEPA. We would be interested in engaging MMS and other federal agencies in regular dialog on this issue, especially to identify common goals and approaches that could be used to better address the concerns of impacted communities. Although not specified, we acknowledge that MMS has already addressed certain HIA components in the current document, and that those components do identify some of the potential for human impacts from the proposed project. This meets the goals of the National Environmental Policy Act, even if not specifically labeled as HIA.

Thank you for the opportunity to comment on the final EIS. Please feel free to contact Jennifer Curtis at (907) 271-6324 or by electronic email at [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov) with any questions that you may have.

Sincerely,

/s/

Christine Reichgott, Manager  
NEPA Review Unit

cc: Michael R. Salyer, MMS